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Attorney for Defendant  
VALERIAN CHIOCHIU

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	Case No. 2:17-CR-306-JCM-VCF
	)	
Plaintiff,	)	<i>EX PARTE</i> APPLICATION TO
	)	CONTINUE SENTENCING DATE;
vs.	)	ORDER
	)	
VALERIAN CHIOCHIU (#12)	)	Current Date: August 6, 2021
	)	
Defendants.	)	Proposed Date: November 17, 2021

Defendant Valerian Chiochiu by and through his counsel of record, Alan Eisner, hereby applies *ex parte* to continue the present sentencing date. This application is based on the attached declaration of Alan Eisner, attorney for defendant Chiochiu.

Respectfully submitted,  
EISNER GORIN LLP

Dated: August 1, 2021

s/Alan Eisner

ALAN EISNER  
Attorney for Defendant  
VALERIAN CHIOCHIU

DECLARATION OF ALAN EISNER

I, Alan Eisner, declare as follows:

1. I am the attorney or record for defendant Valerian Chiochui. I make this declaration in support of defendant's *ex parte* application to continue the present sentencing date of August 6<sup>th</sup> to a date convenient to this Court and the parties.

2. Defendant pled guilty pursuant to plea agreement on July 31, 2020, and sentencing and disposition was set for December 11, 2020. (Dkt 730.) On October 23, 2020, this court continued sentencing to March 19, 2021 (Dkt. 756). On October 29, 2020, the probation department disclosed the Presentence Investigation Report, which was revised and re-disclosed to the parties on February 20, 2021.

3. On March 10, 2021, pursuant to stipulation between the parties, this court continued the March 19, 2021 sentencing date to the date of June 18, 2021. (Dkt. 793.) On June 9, 2021 this court continued the June 18<sup>th</sup> sentencing date to the present date of August 6, 2021.

4. The government filed its sentencing position on March 12, 2021 and defendant filed his sentencing position on July 23, 2021.

5. On August 4, 2021 defense counsel will begin jury trial in United States v. Manvel Richardson, CR 19-00182-CAS in the Central District of California before the Honorable Judge Christina Snyder. The trial estimate for the Richardson case is 2-3 days. The Richardson trial had been set for August 3, 2021, but at the pretrial status conference on July 29, 2021 the court advised counsel that trial would commence one day later and that Jury selection would be somewhat protracted due to covid protocols of not having all jurors in the courtroom at one time. The court estimated that trial would be completed sometime on Friday, August 6, 2021, the date of sentencing in this case.

6. So as not to inconvenience the court the government in the likely event that defense counsel will be engaged in the Richardson Jury trial on August 6, 2021, defendant moves to continue sentencing to a date convenient to all parties.



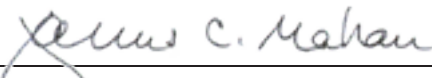
ORDER

Based upon the representation of counsel and for good cause shown, the Court finds that good cause exists, taking into account the public interest in the prompt disposition of criminal cases.

Therefore, IT IS HEREBY ORDERED that:

The sentencing date is continued to November 17, 2021 at 10:00 AM.

Dated: August 2, 2021

  
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HON. James C. Mahan  
United States District Judge